

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

LLOYD GARCIA and KARLA GARCIA,)
on behalf of themselves and all others)
similarly situated,)

Plaintiffs,)

v.)

ABBOTT LABORATORIES)
EMPLOYEES CREDIT UNION,)
)

Defendant.

Case No. **1:24-cv-10973**
Judge: **Thomas M. Durkin**

**DEFENDANT ABBOTT LABORATORIES EMPLOYEES CREDIT UNION'S
UNOPPOSED MOTION FOR EXTENSION OF TIME
TO RESPOND TO PLAINTIFF'S COMPLAINT**

Defendant Abbott Laboratories Employees Credit Union ("ALEC") respectfully requests that this Court enter an order extending the time to answer or otherwise respond to Plaintiff's Complaint to January 13, 2025. ALEC states as follows in support of its motion:

1. Plaintiffs Lloyd Garcia and Karla Garcia ("Plaintiffs") filed a Complaint with this Court on October 24, 2024.
2. ALEC was served with the Complaint on October 31, 2024.
3. Absent an extension, ALEC's deadline to answer or otherwise respond to the Complaint is currently due on November 21, 2024.
4. Plaintiffs' Complaint against ALEC arises from an alleged cybersecurity incident that occurred on or around August 2, 2024.
5. At this time, ALEC and its counsel are still actively investigating the allegations raised in the Complaint in order to prepare ALEC's answer or other response to the Complaint.
6. ALEC respectfully requests an extension through and including January 13, 2025, within which to file its answer or other response to the Complaint.

7. This request is not made for the purpose of delay or harassment, and no party will be prejudiced by the additional time for ALEC to answer or otherwise respond. This request is also made with full reservation of the rights and remedies of all parties, including all applicable defenses and objections of ALEC.

8. Plaintiffs' counsel has been contacted and has no objection to this request.

9. This is ALEC's first request for an extension of time to answer or otherwise respond to the Complaint.

WHEREFORE, ALEC respectfully requests the Court to extend the time for ALEC to answer or otherwise respond to Plaintiffs' Complaint until January 13, 2025.

Respectfully submitted,

POLSINELLI PC

/s/ Dmitry Shifrin

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**ATTORNEYS FOR DEFENDANT
ABBOTT LABORATORIES EMPLOYEES
CREDIT UNION**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been filed electronically on the 18th day of November, 2024. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's electronic filing system.

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Abbott Laboratories Employees Credit Union